

**Robbins Geller  
Rudman & Dowd LLP**

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August 28, 2023

VIA ECF

The Honorable Margo K. Brodie  
United States District Court  
for the Eastern District of New York  
225 Cadman Plaza East  
Courtroom 6F  
Brooklyn, NY 11201

Re: *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation*,  
No. 1:05-MD-1720 (MKB)(VMS)

Dear Judge Brodie:

Rule 23(b)(3) Class Counsel (“Class Counsel”) write regarding paragraphs 24 and 25 of the Superseding and Amended Definitive Class Settlement Agreement of the Rule 23(b)(3) Class Plaintiffs and the Defendants (“Settlement Agreement”) (ECF 7257-2) in the above referenced matter.

Paragraph 24 states:

Within twenty business days after the Settlement Final Date, and as ordered by the Court, the Rule 23(b)(3) Class Plaintiffs, Visa Defendants, and Mastercard Defendants, with the consent of the Bank Defendants, will authorize the Escrow Agent to transfer the contents of the Class Settlement Interchange Escrow Account to the Class Settlement Cash Escrow Account.

Paragraph 25 then provides that the Escrow Agent may make various payments related to the administration of the settlement, Attorneys’ Fee Awards, and other matters.

Pursuant to these provisions, Visa, Mastercard, and the Bank Defendants have consented to allow this transfer to occur on or after August 28, 2023.

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Class Counsel now respectfully request an Order from the Court allowing this transfer to occur as contemplated by paragraph 24 of the Settlement Agreement.

Respectfully submitted,

*/s/ K. Craig Wildfang*  
K. Craig Wildfang  
Thomas J. Undlin  
**Robins Kaplan LLP**

*/s/ Eric L. Cramer*  
Eric L. Cramer  
Michael J. Kane  
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*/s/ Patrick J. Coughlin*  
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Alexandra S. Bernay  
**Robbins Geller Rudman  
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cc: All Counsel of Record via ECF